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VIA ECF ONLY

May 31, 2017

The Honorable Judge Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 1007-1312

Re: Cabrera et al., v. Silverlining Holding Corp., et al.
Case No. 16-CV-09107-RWS

Dear Judge Sweet:

I am counsel for Silverlining Holding Corp. and Daniel Potter, the Defendants in the above-referenced action. This morning I filed via ECF a Motion to Appear Pro Hac Vice (document 18) that has been rejected as deficient due, in part, to the fact that all but one of the Certificates of Good Standing I submitted were issued more than 30 days ago (oldest of which is NY 3/27/17).

I have now requested updated certificates from each of the state bars of VA, MD, DC, NY, MA and NH in which I am admitted and in good standing. Given the number of jurisdictions from which I require a certificate, I do not anticipate having them all in hand within the next week. As a Default has been entered against the Defendants, I believe it is necessary to move quickly to remove that default under Fed. R. Civ. P. 55(b), and if it admitted *Pro Hac Vice* I expect to do so immediately.

Pursuant to the Instructions and Forms for Admission Pro Hac Vice, I am requesting the opportunity to appear before the Court on an Oral Motion at the Court's earliest convenience on June 1st, 5th, 6th or 7th. I would then supplement my oral motion with updated Certificates of Good Standing as soon as received thereafter.

Thank you for your consideration of this matter.

Sincerely,


Ryan D. Sullivan

cc: Walker Green Harman, Jr. (via ECF only)
Edgar Mikel Rivera (via ECF only)